IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF MISSISSIPPI NORTHERN DIVISION

MICHAEL COREY JENKINS AND EDDIE TERRELL PARKER

PLAINTIFFS

VS.

CIVIL ACTION NO.: 3:23-cv-00374-DPJ-FKB

RANKIN COUNTY, MISSISSIPPI, ET AL.

DEFENDANTS

UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT

Defendant City of Richland, Mississippi ("the City") requests a 30-day extension until February 1, 2024, to answer or otherwise respond to Plaintiffs' Amended Complaint:

- 1. Plaintiffs filed this lawsuit on June 12, 2023. See Doc. No. 1.
- 2. Plaintiffs filed an Amended Complaint on November 21, 2023, naming the City as a Defendant. *See* Doc. No. 28.
 - 3. Summons was issued to the City on December 7, 2023. See Doc. No. 33.
- 3. It is undersigned counsel's understanding that the City was served with process on December 12, 2023.
 - 4. Accordingly, the City's responsive pleading is currently due on January 2, 2024.
- 3. Due to additional obligations and time constraints, the City needs additional time to fully investigate the allegations contained in the Amended Complaint. The City therefore requests an additional 30 days from January 2, 2024, to file a responsive pleading. If granted, the responsive pleading for the City would be due on or before February 1, 2024.
- 4. Plaintiffs' counsel was contacted and does not oppose the requested extension of time.

5. Given the nature of this request, the City asks that any requirement of a separate memorandum in support be waived.

For these reasons, the City requests until February 1, 2024, to answer or otherwise respond to the Complaint.

Dated: December 19, 2023.

Respectfully submitted,

PHELPS DUNBAR LLP

BY: /s/ Mallory K. Bland

G. Todd Butler MS Bar No. #102907 Mallory K. Bland, MB #105665 4270 I-55 North Jackson, Mississippi 39211-6391 Post Office Box 16114 Jackson, Mississippi 39236-6114

Telephone: 601-352-2300 Telecopier: 601-360-9777

Email: todd.butler@phelps.com mallory.bland@phelps.com

CERTIFICATE OF SERVICE

I certify that, on December 19, 2023, I electronically filed this motion with the Clerk of the Court, using the CM/ECF system, which sent notification of such filing to all counsel of record.

/s/ Mallory K, Bland

Mallory K. Bland